

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :

2

V.

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NO. 3:16-CR-00319

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STEVEN BORGIA

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ELECTRONICALLY FILED

MOTION FOR RETURN OF PROPERTY

Movant Steven Borgia, by and through his undersigned counsel, hereby moves for return of his surrendered passport, and in support thereof, states the following:

1. Steven Borgia pled guilty to Conspiracy to Commit Wire Fraud in violation of 18 U.S.C. § 371 on November 30, 2016.
2. On July 12, 2017, Mr. Borgia was sentenced to one year of probation and six (6) months of home confinement with electronic monitoring.
3. Mr. Borgia was required to surrender his passport to the Clerk of The United States District Court for the Middle District of Pennsylvania as a condition of bail.
4. Consistent with the conditions of his bail, Mr. Borgia surrendered his passport.

5. Mr. Borgia seeks the return of his passport as the surrender was a condition of bail and not part of the Sentence by this Court.

6. Mr. Borgia understands and acknowledges that if his passport is returned, any travel outside of the Middle District of Pennsylvania requires prior approval and permission from the Court or probation.

7. Mr. Borgia has not violated any of the conditions of his probation since the commencement of his supervision.

WHEREFORE, Steven Borgia respectfully requests that this Honorable Court order the return of his passport.

Respectfully submitted,

/s/ Patrick A. Casey
Patrick A. Casey
Suzanne P. Conaboy

Attorneys for Defendant,
Steven Borgia

Myers, Brier & Kelly, L.L.P.
425 Spruce Street, Suite 200
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(570) 342-6100

Date: December 6, 2017

CERTIFICATE OF SERVICE

I, Patrick A. Casey, hereby certify that a true and correct copy of the foregoing Motion for Return of Property was served upon the following counsel of record via the Court's Electronic Case Filing system on this 6th day of December, 2017:

Evan Gotlob
United States Attorney's Office
Herman T. Schneebeli Federal Building
240 West 3rd Street, Suite 218
Williamsport, PA 17701

/s/ Patrick A. Casey